

EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILL EL, an adult individual and
BEYSHAUD EL, an adult individual,

Plaintiffs,

v.

CITY OF PITTSBURGH, ET AL.

Defendants.

CIVIL ACTION

No. 2:15-cv-834

Judge Nora Barry Fischer

**PLAINTIFF'S RESPONSES TO
DEFENDANTS' FIRST SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

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AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

AND NOW, come the Plaintiff's Will & Beyshaud El by and through undersigned counsel, and respectfully submit the within *Responses to the Defendant's First Set of Interrogatories and Requests for Production of Documents*:

INSTRUCTIONS AND DEFINITIONS

Pursuant to Fed.R.Civ.P. 26 et seq. and Local Rule 33 et seq. service hereof is made of the original and two (2) copies of the Defendants First Set of Interrogatories. You are notified that your Answers, duly executed and sworn to, must be entered after the correspondingly-numbered Interrogatory or part thereof to which it is responsive on the copies served or reproductions thereof, attaching such additional pages as may be required for complete Answers.

These Interrogatories and Requests for Production of Documents are continuing in nature and, therefore, will require supplemental responses as additional information is obtained by the Plaintiff as mandated pursuant to the applicable Rules of Civil Procedure. When addressing these Interrogatories and Requests for Production of documents, you are to exercise due diligence to secure the requested information and not merely respond on the basis of your personal knowledge at this time.

8. In paragraph 23 of your Complaint, you allege that the responding officers knew or should have known that the Plaintiffs had not committed any crimes and their civil rights were being violated. Please list and identify any and all evidence in your possession that supports this allegation.

ANSWER: See Police Report

9. In paragraphs 48-58 of your Complaint, you allege that the City of Pittsburgh “had in effect policies, practices, and customs that condoned and fostered the unconstitutional conduct of the individual Defendants, and were a direct and proximate cause of the damages and injuries complained of herein,” and you further allege that such alleged “wrongful policies, practices, customs and/or usages . . . demonstrated a deliberate indifference on the part of policy makers of the CITY OF PITTSBURGH to the constitutional rights of persons within the city, and were the direct and proximate cause of the violations of Plaintiffs’ rights alleged herein.” Please identify and describe any and all evidence in your possession that supports these allegations.

ANSWER: See Police Report

possession to the defendants in its' initial disclosures.

6. Produce any and all non-privileged communications by Plaintiff regarding the robbery of the First National Bank for which she was arrested, the investigation of the bank robbery, Plaintiff's arrest, and Plaintiff's claims and alleged damages. This request includes any written correspondence including letters, electronic mail, messages sent via, including but not limited to, Facebook, Twitter, or Instagram, posts on social media, including but not limited to Facebook, Twitter, or Instagram.

RESPONSE:- Not Applicable

Respectfully submitted,

TODD J. HOLLIS LAW

s/ Todd Jonathan Hollis, Esq.

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